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23 **Attorneys for Defendant**
24 **MICHAEL JOSEPH JACKSON**

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28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,

Defendant.

Case No. 1133603

EMERGENCY APPLICATION FOR AN ORDER DIRECTING THAT MATERIALS SEIZED FROM SEARCH WARRANT NUMBER 5135 BE SEALED AND THAT THE PROVISIONS OF PENAL CODE SECTION 1524(C) BE IMPLEMENTED; DECLARATION OF ROBERT M. SANGER; [PROPOSED] ORDER

UNDER SEAL

Honorable Rodney S. Melville
Date: September 17, 2004
Time: 1:00 pm
Dept: SM 8

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

SEP 16 2004

GARY M. BLAIR, Executive Officer
BY *Carrie L. Wagner*
CARRIE L. WAGNER, Deputy Clerk

* Unsealed pursuant
to 6/16/05 Court's
order

EMERGENCY APPLICATION

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TO THE CLERK OF THE ABOVE ENTITLED COURT;

Defendant requests that the Court issue an order directing that all items seized from [REDACTED] California, the residence of Mr. Jackson's personal assistant, Evvy Tavasci, on September 15, 2004, be sealed and that the provisions of California Penal Code Section 1524(o) be implemented, and such other and further relief as the court might deem just and proper, on the grounds that the materials seized are protected by the attorney-client privilege, the attorney work product doctrine, and the right of Mr. Jackson to communicate with counsel to prepare his defense. Mr. Jackson reserves the right to make other motions regarding these particular items and the search in general. This application is based on this application, the Memorandum of Points and Authorities and Declaration of Robert M. Sanger filed concurrently herewith as well as all papers, records and files herein and such supplemental and further papers, exhibits and evidence as may be filed hereafter and as may be adduced at the hearing on this application.

Dated: September 16, 2004

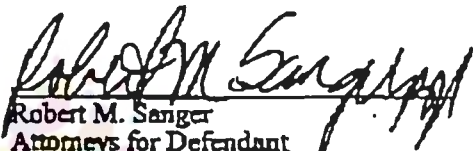
Respectfully submitted,

COLLINS, MESEREAU, REDDOCK & YU
Thomas A. Mesereau, Jr.
Susan C. Yu

KATTEN MUCHIN ZAVIS ROSENMAN
Steve Cochran
Stacey McKee Knight

SANGER & SWYSEN
Robert M. Sanger

OXMAN & JAROSCAK
Brian Oxman

By: 
Robert M. Sanger
Attorneys for Defendant
MICHAEL JOSEPH JACKSON

EMERGENCY APPLICATION

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
SANTA MARIA CIVIL DIVISION
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FAX TRANSMITTAL SHEET

DATE: 6-20-06 TOTAL PAGES: 6 (inc. cover sheet)

TO: Samantha OR Gary

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FAX # x3137 or x2219 or x3582

SENT BY: Carrie Wagner for Judge Melville PHONE #: 346-7678

SPECIAL INSTRUCTIONS:

People v. Jackson for internet posting. Please check it asap for any "bad" pages and let me know asap!

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1 Exhibit #73B: Letter to victim's family's landlady

2 Exhibit #73C: Envelope to victim's family's Landlady

3 Exhibit #80: Passport applications

4 Exhibit #82: Note left by private investigator at victim's apartment

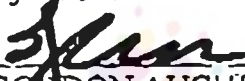
5 Exhibit #91: Brashcars video with documentation

6
7 A photograph or copy of each exhibit released will be lodged with the court at the
8 time of release pursuant to Penal Code Section 1417.2. The Santa Barbara Sheriff's
9 Office will make arrangements for the defense to view these exhibits should they wish to
10 do so during the time the exhibits are in the custody of the Sheriff. If forensic
11 examination of a given exhibit will consume or alter that exhibit to the extent that further
12 forensic examination by the defense is rendered impossible, the Sheriff will notify the
13 defense of that fact and, at the request of the defense, allow the defense a reasonable time
14 to apply to the Court for such further order as the Court may deem appropriate. All
15 exhibits will be returned to the court's custody upon completion of necessary forensic
16 analysis.

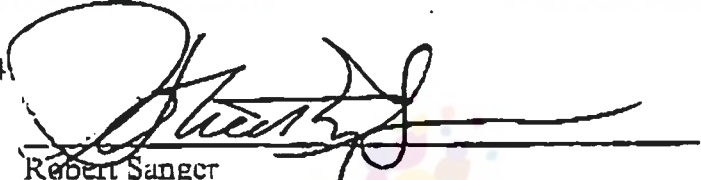
17 This stipulation shall in no way effect the admissibility of such exhibits.

18 DATED: September 24, 2004

19
20 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara

21 By: 
22 GORDON AUCHINCLOSS
23 Deputy District Attorney
24 Attorney for Plaintiff

25 DATED: September 24, 2004

26
27 
28 Robert Sanger
Attorney for defendant